

# Exhibit I



Deposition of:  
**Robert Ritchie , Ph.D.**

*August 4, 2017*

In the Matter of:  
**In Re: Bard IVC Filters Products  
Liability**

**Veritext Legal Solutions**

1075 Peachtree St. NE , Suite 3625

Atlanta, GA, 30309

800.808.4958 | [calendar-atl@veritext.com](mailto:calendar-atl@veritext.com) | 770.343.9696

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1 Q. But you haven't studied what Kuo found?

2 A. No.

3 Q. Okay. That's all I wanted to ask you about  
4 Hyde. So now we will go to Mrs. Jones. And her  
5 report is 6009.

6 She is an Eclipse filter?

7 A. Correct.

8 Q. We previously talked about Eclipse  
9 modifications involving electropolishing --

10 A. Correct.

11 Q. -- in your last deposition.

12 A. Right.

13 Q. And you agree that that modification could  
14 improve surface conditions and the centerless grind  
15 issues that had been in the previous iterations of  
16 filter, true?

17 A. It will do that, yes.

18 Q. Okay. Where did Mrs. Jones' fracture?

19 A. It was an arm fracture.

20 Q. Do you know where?

21 A. Well, again, I don't know precisely where,  
22 but I would imagine that it would be in the same  
23 location, within a millimeter of the sheath, because  
24 that's where all the arm fractures that I've seen  
25 seem to occur.